

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

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PETER G. J. J.
CLERK US DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

SEALED INDICTMENT

v.

Case No. **22 CR 052 JDP**
18 U.S.C. § 2252(a)(2)

ALEXANDER KUCHARSKI,

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about October 20, 2021, in the Western District of Wisconsin, the
defendant,

ALEXANDER KUCHARSKI,

knowingly distributed a visual depiction using any means or facility of interstate and
foreign commerce, and the production of such visual depiction involved the use of a
minor engaging in sexually explicit conduct, and the depiction was of such conduct.
Specifically, KUCHARSKI posted a file beginning with 872c, an image of a minor
engaged in sexually explicit conduct, onto Kik.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

COUNT 2

On or about November 6, 2021, in the Western District of Wisconsin, the
defendant,

ALEXANDER KUCHARSKI,

knowingly distributed a visual depiction using any means or facility of interstate and foreign commerce, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the depiction was of such conduct. Specifically, KUCHARSKI posted a file beginning with 0f70, an image of a minor engaged in sexually explicit conduct, onto Kik.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

COUNT 3

On or about November 6, 2021, in the Western District of Wisconsin, the defendant,

ALEXANDER KUCHARSKI,

knowingly distributed a visual depiction using any means or facility of interstate and foreign commerce, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the depiction was of such conduct. Specifically, KUCHARSKI posted a file beginning with f073, an image of a minor engaged in sexually explicit conduct, onto Kik.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

COUNT 4

On or about November 10, 2021, in the Western District of Wisconsin, the defendant,

ALEXANDER KUCHARSKI,

knowingly distributed a visual depiction using any means or facility of interstate and foreign commerce, and the production of such visual depiction involved the use of a

minor engaging in sexually explicit conduct, and the depiction was of such conduct. Specifically, KUCHARSKI posted a file beginning with 8adc, an image of a minor engaged in sexually explicit conduct, onto Kik.

(In violation of Title 18, United States Code, Section 2252(a)(2)).

FORFEITURE ALLEGATION

As a result of the offenses charged in Counts 1-4 of this indictment, and upon conviction for violating Title 18, United States Code, Section 2252(a)(2), pursuant to Title 18, United States Code, Section 2253, the defendant,

ALEXANDER KUCHARSKI,

shall forfeit to the United States his right, title, and interest in:

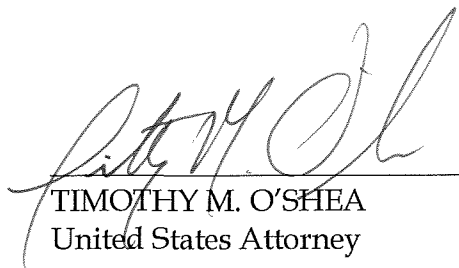
(1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained.

A TRUE BILL



PRESIDING JUROR

Indictment returned: 04-20-22


TIMOTHY M. O'SHEA
United States Attorney